



NORTHAMPTON  
PRIMARY ACADEMY TRUST



# SAFEGUARDING AND CHILD PROTECTION POLICY

Associated Policies:	Procedure for allegations against staff
Author:	Leader of Governance
Date Approved:	21.08.2023
Approved by:	Board of Trustees
Date issued:	21.08.2023
Date of Review:	September 2024
Website Inclusion	Y
Version:	RevisedFinal_V1.0 23

## CONTENTS

Key contacts for Safeguarding and Child Protection at the school .....	3
Implementation, monitoring and review .....	5
1. Aim of the policy .....	5
2. Scope .....	7
3. Definitions.....	7
4. Legislation and statutory guidance .....	9
5. Equality Statement .....	10
6. Confidentiality and information sharing.....	11
7. Roles and responsibilities .....	12
8. Recognising abuse: Training.....	20
9. Recognising and responding to abuse: How to take action .....	23
10. Specific safeguarding issues.....	29
11. Pupils with special educational needs and disabilities (SEND) .....	33
12. Pupils with a social worker and those that have previously needed a social worker.....	34
13. Looked after children and previously looked after children .....	34
14. Record keeping.....	35
15. Relationships, Sex and Health Education (RSHE).....	36
16. Safer working practice .....	37
17. Safeguarding concerns about and allegations against members of staff .....	38
18. Complaints and concerns about school safeguarding policies .....	42
19. Use of school premises for non-school activities .....	42
Appendix 1 Child on child abuse .....	43
Appendix 2 Types of Abuse .....	56
Appendix 3 Safer recruitment .....	69
Appendix 4 How the school responds to allegations that may meet the harms threshold.....	70
Appendix 5 Online safety .....	71
Appendix 6 NPAT staff mandatory training record 2023-2024 .....	72
Appendix 7 What to do if you are worried a child is being abused .....	74
Appendix 8 Indicators of abuse and neglect .....	75
Appendix 9 Child facing guidance to child on child abuse. ....	76

## KEY CONTACTS FOR SAFEGUARDING AND CHILD PROTECTION AT THE SCHOOL

Designated Safeguarding Lead	
Name	Clare Searing
Telephone number	01604 683850/07510 124571
Email address	<a href="mailto:clare.searing@uptonmeadows.org">clare.searing@uptonmeadows.org</a>
Deputy Designated Safeguarding Lead	
Name	Vicky Palmer, Lois Beshiri, Nicola Laughton
Telephone number	01604 683850/07510 124571
Email address	<a href="mailto:victoria.palmer@uptonmeadows.org">victoria.palmer@uptonmeadows.org</a> ; <a href="mailto:lois.beshiri@uptonmeadows.org">lois.beshiri@uptonmeadows.org</a> ; <a href="mailto:nicola.laughton@uptonmeadows.org">nicola.laughton@uptonmeadows.org</a>
Designated Looked After Children Lead (LAC)	
Name	Clare Searing
Telephone number	01604 683850
Email address	<a href="mailto:clare.searing@uptonmeadows.org">clare.searing@uptonmeadows.org</a>
Nominated Governor for Safeguarding	
Name	Lisa O'Reilly
Email address	<a href="mailto:lisa.oreilly@uptonmeadows.org">lisa.oreilly@uptonmeadows.org</a>
Chair of Governors	
Name	Ian Crich
Email address	<a href="mailto:ian.crich@uptonmeadows.org">ian.crich@uptonmeadows.org</a>
NPAT Safeguarding Trustee	
Name	Carly Waterman
Email address	<a href="mailto:carly.waterman@npatschools.org">carly.waterman@npatschools.org</a>
LA Designated Officer (formerly LADO)	
Name	Andrew Smith/Sheila Kempster
Telephone number	01604 362993/01604 367862

Email address	<a href="mailto:Andrew.Smith@NCTrust.co.uk">Andrew.Smith@NCTrust.co.uk</a> ; <a href="mailto:Sheila.Kempster@NCTrust.co.uk">Sheila.Kempster@NCTrust.co.uk</a>
---------------	--

## IMPLEMENTATION, MONITORING AND REVIEW

This policy will be reviewed annually by the Board of Trustees. It will be implemented through the schools' induction and training programmes and as part of day-to-day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

### 1. AIM OF THE POLICY

Nothing is more important than keeping all of our children safe, especially the most vulnerable. The aim of this policy is to ensure that all Northampton Primary Academy Trust (NPAT, or the Trust) children and young people are safe and feel safe; that children, parents/carers and staff are able to talk about any safeguarding concerns and feel assured that they will be listened to, and that all staff and volunteers are aware of and implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing or be at risk of harm. In order to consistently safeguard and promote our pupils' welfare, safety, mental and/or physical health or development, we aim to foster an honest, open, caring and supportive climate at all times.

Safeguarding is defined as everything that we do to protect children from maltreatment, prevent impairment of health and/or development, and ensure that children are growing up in circumstances consistent with the provision of safe and effective care. We will take actions to enable all children to have the best outcomes and life chances. Through our school curriculums we will develop rounded individuals who are as equipped as they can be to protect themselves from harm.

This Safeguarding and Child Protection Policy forms part of a suite of documents and policies, which relate to the safeguarding responsibilities of the Trust and its schools.

In particular, this policy should be read in conjunction with the NPAT Safer Recruitment Policy, individual school Behaviour Policies and Anti-Bullying Policies, NPAT Code of Conduct (Staff), Online Safety incorporating Acceptable Use Policy, NPAT Complaints Policy, NPAT Health and Safety Policy, NPAT Safer Recruitment Policy, individual school SEND Policies, NPAT Equality & Diversity Policy, individual schools Sex and Relationship Education Policies (RSHE), NPAT First Aid Policy, NPAT Privacy notices.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively,

all professionals should make sure their approach prioritises the **best interests** of the child or children concerned. (Keeping Children Safe in Education, 2023)

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or trust and/or can occur between children outside of these environments. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harm takes a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

We will endeavour to provide a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We recognise that our schools are part of a wider safeguarding system and work closely with the Northamptonshire Safeguarding Children Partnership and other agencies to promote the welfare of children. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each child.

We understand that children can be abused by adults or by other children. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of child on child abuse) through training, education and robust response procedures.<sup>1</sup> (Keeping Children Safe in Education, 2023)

The aim of this policy is to:

- promote safeguarding and child protection and to provide information about how we work to keep children safe
- ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities
- provide all members of staff with the information required to meet their safeguarding duty and protect children from harm
- provide stakeholders with clear information relating to the school's safeguarding and child protection procedures, and
- ensure that we are protecting children from maltreatment or harm.

---

<sup>1</sup> For full details about how we work to prevent and respond to child on child abuse, please see Appendix 1.

## 2. SCOPE

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of **Northampton Primary Academy Trust Partnership** schools. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

## 3. DEFINITIONS

**Safeguarding and promoting the welfare of children** is defined in Keeping Children Safe in Education (KCSIE) 2023 as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

For the purposes of this policy, the term 'safeguarding' refers to everything that a school does to keep children safe and promote their welfare, including (but not limited to):

- supporting pupils' health, safety and well-being, including their mental health
- meeting the needs of children with special educational needs and/or disabilities
- the use of reasonable force
- meeting the needs of children with medical conditions
- providing first aid
- educational visits
- intimate care and emotional wellbeing
- online safety and associated issues, including IT filtering and monitoring procedures
- appropriate arrangements to ensure school security, taking into account the local context
- keeping children safe from risks, harm and exploitation
- child protection.

**Child protection** is part of safeguarding and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** (physical, emotional or sexual) is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child, or a child or children known or unknown to the child. It can happen in person or online. Where abuse is perpetrated by another child, it is known as ‘child on child’ or ‘child on child’ abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development<sup>2</sup>.

**Child on child abuse** refers to the abuse of a child or children perpetrated by another child or children. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).<sup>3</sup>

---

<sup>2</sup> See Appendix 2 for more information about abuse and neglect.

<sup>3</sup> Keeping Children Safe in Education (2022)



**Children** includes everyone under the age of 18.

**Within this policy:**

- **‘Parent’** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **‘Staff’** or **‘members of staff’** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of Northampton Primary Academy Trust.
- Keeping Children Safe in Education (2023) may be abbreviated to ‘KCSIE’.
- **‘Victim’** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels comfortable with.
- **‘Alleged perpetrator(s)’** and **‘perpetrator(s)’** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a case-by-case basis.

## 4. LEGISLATION AND STATUTORY GUIDANCE

The Trust adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Northamptonshire Safeguarding Children Partnership. This includes:

### **Statutory Guidance**

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2018)
- Multi-agency statutory guidance on female genital mutilation (July 2020)
- Early Years Foundation Stage Legislation
- The Children Act 1989 and The Children Act 2004
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
- The Rehabilitation of Offenders Act 1974
- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance)
- The Education Act 2002
- The School Staffing (England) Regulations 2009
- **The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)**
- **The Childcare Act 2006 (all schools with pupils aged under 8)**

- **The Human Rights Act 1998**, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- **The Equality Act 2010**, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment
- **The Public Sector Equality Duty (PSED)**, which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

Guidance from the Northamptonshire Safeguarding Children Partnership (NSCP) can be found here: <http://www.northamptonshirescb.org.uk/>.

The Trust also has regard to relevant to non-statutory guidance relating to safeguarding, including:

- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Sexual violence and sexual harassment between children in schools and colleges (2022)
- Meeting digital and technology standards in schools and colleges (DFE)

## 5. EQUALITY STATEMENT

We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.

Please see Section 11 for further details about how we work to support children with special educational needs and disabilities (SEND).

## 6. CONFIDENTIALITY AND INFORMATION SHARING

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The school adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018). **Please see the NPAT GDPR Policy and Privacy Notices for more information.**

### 6.1 Sharing information with parents

All NPAT schools will ensure the Safeguarding and Child Protection Policy is available publicly via their school website.

Where appropriate, we will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so (see Section 6.2 for more details). In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

### 6.2 Consent

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

When considering whether, or not, to share safeguarding information (especially with other agencies), NPAT schools will record who they are sharing that information with and for what reason. If a decision is taken not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

All staff in NPAT schools will be made aware of their duties in relation to the General Data Protection Regulations and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.<sup>4</sup>

## 7. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school/Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 7.1 Board of Trustees and Local Governing Bodies (LGB)

Local governing bodies have a strategic leadership responsibility for their school's safeguarding arrangements. The NPAT Board of Trustees will appoint a senior board level (or equivalent) Trustee Safeguarding Lead to monitor the effectiveness of this policy in conjunction with the Board of Trustees.

Trustees and governors will ensure that there are mechanisms in place to assist staff in understanding and discharging their statutory safeguarding roles and responsibilities. Governors will ensure that the school is working with local safeguarding partners and that the school contributes to multi-agency working,

---

<sup>4</sup> See Working Together to Safeguard Children (2018), pages 18-22 for more information.

adhering to Working Together to Safeguard Children (2018). All governors will read Annex A Part 1 KCSIE (2023) and a record will be kept of this.

Part 2 of KCSIE (2023) sets out the responsibilities of governing bodies. NPAT school governors and Trustees will adhere to this guidance at all times. As part of these responsibilities the governors will:

- ensure that they comply with their duties under statutory guidance and legislation; including its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- work to facilitate a whole school approach to safeguarding, by ensuring that safeguarding and child protection underpin all relevant aspects of policy and process
- ensure that policies, procedure and training at their school are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner
- ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning
- ensure that the school takes into account local criteria for action and protocol for assessment and supply information as requested by the three safeguarding partners
- ensure that the school has an effective safeguarding and child protection policy, which is published on the school website and/or available by other means and review this annually
- ensure that the school has systems in place to allow children to raise concerns, which are well-promoted, well-understood and easily accessible
- ensure that the school takes safeguarding concerns seriously and takes the wishes and feelings of children into account
- ensure that there are systems in place for young people to safely express their views and give feedback on safeguarding practice
- ensure that the school has a suitable individual Behaviour Policy and Anti-Bullying Policy for pupils and that all are familiar with the NPAT Code of Conduct for Staff and Volunteers
- ensure that all staff undergo safeguarding and child protection training (including online safety which, amongst other things, will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) on induction and regularly thereafter
- consider a whole-school approach to online safety, including the use of mobile technology in school
- ensure that the DSL has an understanding of the filtering and monitoring systems and processes in place

- ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems
- ensure that children are taught about safeguarding, including online safety. See section 10.6 Appendix 6 of this policy and the NPAT Online Safety Policy for further information
- ensure that appropriate safeguarding arrangements are in place to respond to children missing from education and those who are absent from education, particularly on repeat occasions and/or for prolonged periods
- appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead and ensure that the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- ensure that appropriate filters and monitoring systems are in place to keep children safe online
- review at least annually the provision and effectiveness of school filters and monitoring systems. The leadership team, DSL and relevant staff should be:
  - aware of and understand the systems in place
  - manage them effectively
  - know how to escalate concerns when identified.

In addition, the school will:

- assign roles and responsibilities to manage filtering and monitoring systems
- ensure there are systems in place to block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff including allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 4 of this policy covers this procedure
- respond to allegations of abuse against the Headteacher. The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate
- ensure that appropriate filters and monitoring systems are in place to keep children safe online. Further details of the Trust's filter and monitoring systems can be found in the NPAT Online Safety Policy
- ensure that there are appropriate procedures in place to manage safeguarding concerns, or allegations against staff
- ensure that a Trustee is appointed to take the lead on safeguarding with a view to maintaining Trust-wide oversight. (The appointed Trustee takes the

lead on safeguarding, however the board retains collective responsibility for making sure that safeguarding procedures are properly followed) [NGA]

- where services or activities are provided separately by another body, seek assurances in writing that the other body has appropriate policies and procedures in place to safeguard and protect children and there are arrangements in place to liaise with the school on these matters where appropriate.

## **7.2 The Headteacher**

The Headteacher is responsible for the implementation of this policy. The Headteacher will:

- ensure that the school uses the annually reviewed NPAT Safeguarding and Child Protection policy
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction
- ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead
- ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead
- organise appropriate cover for the role of Designated Safeguarding Lead for any out of hours/out of term activities
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' - including IAPLACS (Internationally adopted previously looked after children) to promote the educational achievement of looked after children and previously looked after children
- appoint a lead for online safety (usually the DSL – see KCSIE 2023, paragraph,103)
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE), the NPAT Safer Recruitment Policy and that a single, central record (SCR) is maintained with evidence of statutory security checks having been conducted plus other required details of all members of staff, volunteers and third-party contractors who are in contact with children
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against

another member of staff or volunteer, where appropriate in line with the NPAT Allegations Against Staff and Volunteers policy

- make decisions regarding all low-level concerns – (see the NPAT Staff Code of Conduct for further information)
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- ensure that the school works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012)
- ensure that children's social care (from the host local authority or placing authority) have access to the school to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2023)
- ensure the relevant staffing ratios are met, and that each child in the Early Years Foundation Stage is assigned a key person
- ensure all governors have read Annex A Part 1
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of Keeping Children Safe in Education (September 2023)
- where services or activities are provided separately by another body, ensure that the other body has appropriate policies and procedures in place to safeguard and protect children.

### 7.3 The Designated Safeguarding Lead (DSL)

The full responsibilities of the DSL are set out in Annex C, KCSIE (2023).

The DSL is a member of the Senior Leadership Team and a qualified teacher. The DSL takes lead responsibility for child protection and wider safeguarding (including online safety and understanding the filtering and monitoring systems and processes in place);

When the DSL is absent, the Deputy/Deputies – will act as cover. If the DSL and Deputy/Deputies are not available, Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

Any deputies will be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the Designated Safeguarding Lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child



protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

The Designated Safeguarding Lead will:

- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty
- advise on the response to safeguarding concerns
- liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2018)
- identify if children may benefit from early help
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel
- support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation
- refer cases to the police where a crime may have been committed
- be available during school or college hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available
- undertake training to equip them with the skills to carry out the role and update this every two years
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of Keeping Children Safe in Education (2023)
- update their knowledge and skills regularly and keep up with any developments relevant to their role
- provide staff in school with the knowledge, skills and support required to safeguard children
- ensure **ALL** staff receive appropriate safeguarding training and regular updates which should include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files and records
- take responsibility for the transfer of safeguarding files when a child leaves the school
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings

- work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team; The DSL(s) will take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement. This will include understanding their academic progress and attainment and maintaining a culture of high aspirations for this cohort and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential
- we recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children
- promote a 'culture of safeguarding', in which every member of the school community acts in the best interests of the child
- ensure that staff are aware of the unauthorised absence procedures and children missing education procedures
- regularly meet with the Safeguarding Governor and/or Chair of Governors to review safeguarding at the school; and liaise with the Headteacher regarding safeguarding cases and issues
- have a good understanding of harmful sexual behaviour; and how to support children in the event that this issue arises
- know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support
- be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

## 7.4 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff:

- have a responsibility to provide a safe environment, where children can learn
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- will be able to identify indicators of abuse and neglect
- will be made aware of systems in the school that support safeguarding and child protection
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks
- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure
- will be made aware of and should be clear on the school's policy and procedures with regards to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it
- will be made aware of the early help process and understand their role in it
- should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance
- may be required to support social workers and other agencies following a referral
- will be made aware of the process for making referrals to Children's Social Care (through the MASH), understand statutory assessments and the role that they may be expected to play in such assessments
- should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety –including IT filtering and monitoring procedures and how to report related safeguarding or technical concerns)
- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- will receive safeguarding updates throughout the year as part of continuous professional development

- will be encouraged to contribute to the development of safeguarding policy and practice
- should always seek advice from the Designated Safeguarding Lead if they are unsure
- reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- provide a safe space for pupils who are LGBT to speak out and share their concerns.

All teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

All staff will be made aware of our systems and documents that support safeguarding, including this policy, the NPAT Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and any deputies, the Behaviour policy, the Online Safety policy and the safeguarding response to children who go missing from education and children who are absent from education, particularly on repeat occasions and/or for prolonged periods.

All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of Keeping Children Safe in Education (September 2023) annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be provided with a copy of either Part 1 or Annex A of Keeping Children Safe in Education (September 2023) and must read this document.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of school safeguarding policy or practice, they speak to the Designated Safeguarding Lead without delay, so that additional training can be put in place.

## 8. RECOGNISING ABUSE: TRAINING

The school/Trust is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

### 8.1 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the school's safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, as applicable.

Teachers will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all pupils.

### 8.2 The DSL and Deputy DSLs

- The DSL and Deputy DSLs will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training and online safety training.

### 8.3 Governors

- All governors receive safeguarding training (including online safety) at induction which is regularly updated, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities including providing strategic challenge and ensuring there is a whole school approach to safeguarding.
- The Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they should receive training in managing allegations for this purpose.

#### **8.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education’s statutory guidance, KCSIE (2023), and will be in line with local safeguarding procedures.

#### **8.5 Supervision**

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

#### **8.6 Specific safeguarding issues**

Staff will also receive specific training on the following issues and action will be taken if the school suspects that a child is at risk of or is the victim of:

- physical abuse
- sexual abuse
- child sexual exploitation
- emotional abuse
- neglect
- child criminal exploitation (including involvement in county lines)
- domestic abuse
- fabricated or induced illness
- faith-based abuse
- female genital mutilation
- forced marriage
- gangs or youth violence
- gender-based violence
- hate
- online safety
- child on child abuse
- radicalisation
- relationship abuse
- serious violence
- sexual violence or sexual harassment (including child on child abuse)
- sexting or sharing of youth produced sexual imagery
- so-called ‘honour-based’ abuse
- trafficking and modern slavery.

All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children

outside of these environments. All staff will be expected to consider whether children are at risk of abuse or exploitation in situations outside their families (extra-familial harm).

Staff will also be made aware of the additional safeguarding vulnerabilities of:

- children in the court system
- children missing from education
- children with family members in prison
- children who are homeless
- child who have or have had a social worker
- children who are young carers
- children looked after or previously looked after, and
- children with mental health problems.

## 9. RECOGNISING AND RESPONDING TO ABUSE: HOW TO TAKE ACTION

If a member of staff, parent or member of the public is concerned about a pupil's welfare, they should report it to the DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead/s without delay. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

All staff will be alert to indicators of abuse (including child on child abuse) and will report any of the following to the Designated Safeguarding Lead immediately:

- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play
- any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories
- any significant changes in attendance or punctuality
- any significant changes in a child's presentation
- any indicators that a child may be experiencing child on child abuse
- any concerns relating to people who may pose a risk of harm to a child, and/or

- any disclosures of abuse that children have made.

More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found at Appendix 1.

The following procedures are in line with statutory guidance (see Section 4) and the Northamptonshire Safeguarding Children Partnership's Threshold Guidance (2018)<sup>5</sup>. Referral procedures can be found in section 9.5.

### **9.1 If a child discloses that they are suffering or at risk of suffering abuse**

If a child discloses that he or she has been abused in some way, the member of staff/volunteer will:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the child to talk freely
- reassure the child, but do not make promises which it might not be possible to keep
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child
- reassure him or her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify
- not criticise the alleged perpetrator
- explain what has to be done next and who has to be told
- enter the details onto MyConcern (see Record Keeping), and
- pass the information to the Designated Safeguarding Lead without delay (see appendix 8). Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 9.2), and tell the DSL as soon as possible that you have done so.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

Bear in mind that some children may:

- not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- not recognise their experiences as harmful

---

<sup>5</sup> <https://www.nctrust.co.uk/help-and-protection-for-children/Documents/NSCB%20Thresholds%20Guidance.pdf>



- feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

## **9.2 If a child is suffering or likely to suffer harm, or in immediate danger**

If you think that a child is suffering or at risk of suffering significant harm, you must report this to the Designated Safeguarding Lead immediately. On occasions when the Designated Safeguarding Lead is not available, it should be reported to the deputy safeguarding lead without delay or a senior member of staff.

Where possible, there should be a conversation with the Designated Safeguarding Lead, but a referral must be made if a child may be suffering or at risk of suffering harm. **Anyone can make a referral to children's social care.** If anyone other than the DSL makes a referral to children's social care or to the police, they should inform the DSL as soon as possible.

## **9.3 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)**

Figure 1 (on page 27 of this policy) illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action (see 9.2).

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the [Northamptonshire Thresholds Guidance](#). If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 6.1 for more details.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:

- managing any support for the child internally via the school's own pastoral support processes
- seeking advice from the local early help co-ordinator/s
- an Early Help Assessment, or
- a referral for statutory services where the child is or might be in need or suffering or likely to suffer significant harm.

## 9.4 Early help

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.<sup>6</sup> If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

We recognise that any child can be the victim of abuse and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

---

<sup>6</sup> For more information about Early Help, please see: <https://www.nctrust.co.uk/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/early-help.aspx>

- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day.

## 9.5 Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see Section 9), you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.<sup>7</sup>

The DSL should refer all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.

Safeguarding Referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): **0300 126 7000** (Option 1).
- By using the online referral form found at: [MASH ONLINE REFERRAL](#)<sup>8</sup>
- In an emergency outside office hours, contact children's social care out of hours team on 01604 626938 or the Police<sup>9</sup>
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999.

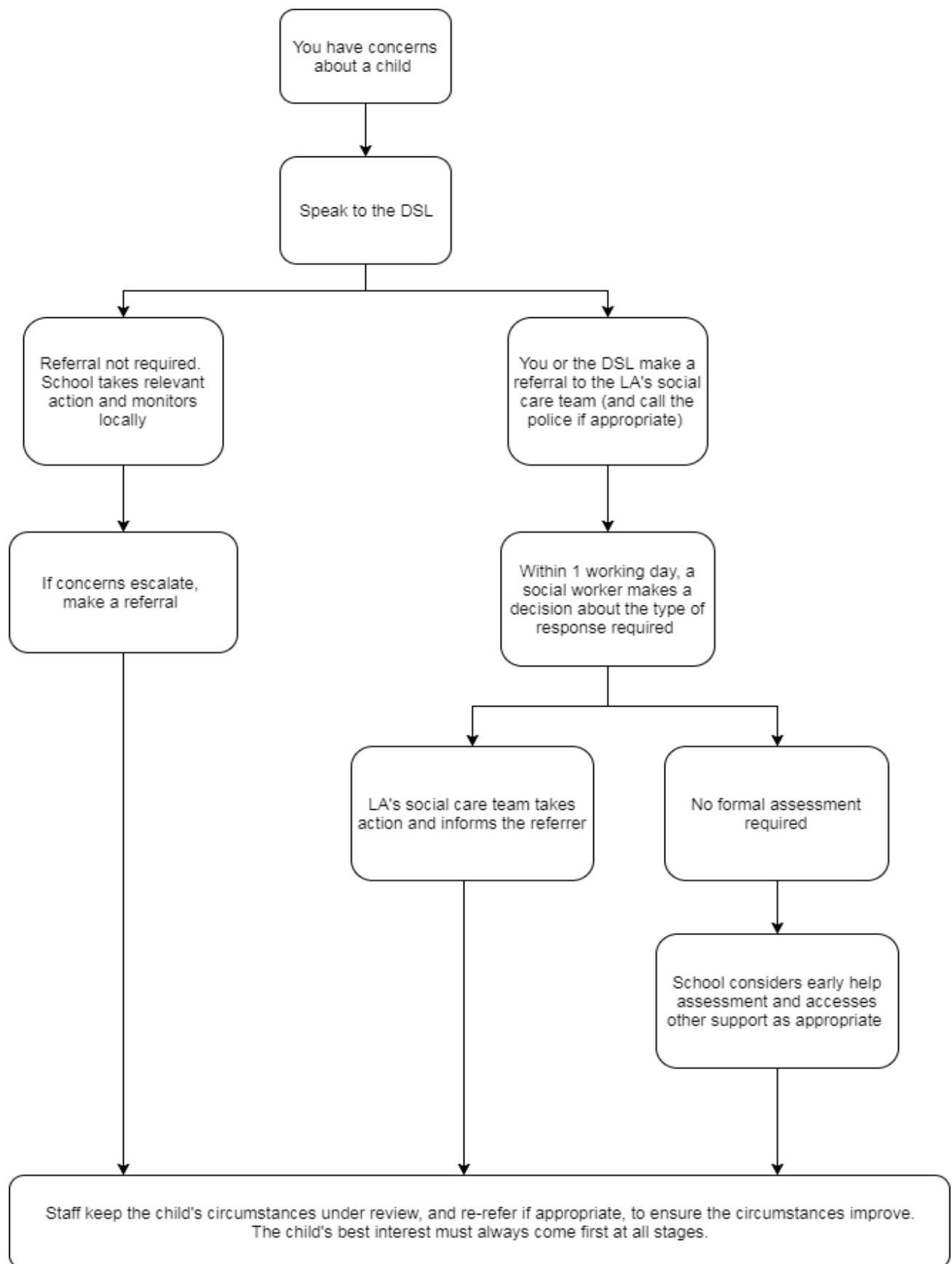
---

<sup>7</sup> The NSCP Case and Conflict Resolution Protocol can be found here: <http://www.northamptonshirescb.org.uk/schools/case-conflict-resolution-protocol/>

<sup>8</sup> <https://www.nctrust.co.uk/Pages/home.aspx>

<sup>9</sup> The Designated Safeguarding Lead may make use of the NPCC guidance '[When to call the police](#)'.

9.6 Figure 1: Reporting and responding to concerns flowchart



## 10. SPECIFIC SAFEGUARDING ISSUES

For more information relating to specific safeguarding issues, please see Appendix 2. For more information about child on child abuse, please see Appendix 1.

### 10.1 Female Genital Mutilation (FGM)

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

### 10.2 Radicalisation and extremism

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL should be informed immediately.

### 10.3 Children potentially at greater risk of harm

The school recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

The DSL will hold information relating to social workers working with children at the school. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

We will also take action to promote the educational outcomes of and to protect:

- children missing education

- children who are absent from education;(KCSIE, September 23, page 144)
- children missing from home or care.

There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with Keeping Children Safe in Education (2023) to support children and families in the following circumstances:

- children facing the court procedures and/or children in the court system
- children with family members in prison
- children who are homeless
- children who need a social worker.

#### **10.4 Mental health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child we will respond to the concern, inform and discuss our concerns with parents/carers and seek ways to support the child in and out of school.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in Section 9.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern. However, this school will provide information and signposting services to children and parents and assist with the teaching of emotional health and wellbeing to children in our curriculum

All schools have a trained Mental Health First Aider who can provide such information.

Refer to the Department for Education guidance on [mental health and behaviour in schools](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2)<sup>10</sup> for more information.

### 10.5 Child on child abuse

NPAT takes all reports and concerns about child on child abuse, including child on child sexual violence and harassment, very seriously. This includes any reports or concerns that have occurred outside of school premises, or online.

In order to ensure that our policy on child on child abuse is well-promoted, easily understood and accessible, we have included information about our approach to minimising and responding to child on child abuse as an appendix. Full details of how NPAT schools prevent, respond to and support victims of child on child abuse can be found at Appendix 1.

### 10.6 Online safety

The NPAT Online Safety Policy is a separate policy and more information can be found in Appendix 5 of this policy. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers.

NPAT has appropriate filtering and monitoring systems in place, these processes will be reviewed at least annually to ensure its effectiveness. The Senior Leadership Team, The Central Team and other relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

NPAT will consider the age range of children accessing the IT system alongside those who are potentially at greater risk of harm when making decisions about safeguarding risks versus proportionality of cost.

NPAT will consider the risk assessment required by the Prevent Duty when deciding on the appropriate filtering and monitoring systems.

NPAT will carry out appropriate filtering and monitoring on school devices and networks, this will include devices issued to staff. – please refer to the **NPAT Online Safety Policy**

All staff are made aware of the Trust policy on Online Safety which sets our expectations relating to:

---

<sup>10</sup> <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

creating a safer online environment – including training requirements, filters and monitoring:

- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line
- inspiring safe and responsible use and behaviour
- safe use of mobile phones both within school and on school trips/outings
- safe use of camera equipment, including camera phones, and
- what steps to take if you have concerns and where to go for further help.

Staff must read the Online Safety Policy in conjunction with our NPAT Code of Conduct in relation to personal online behaviour.

Any concerns related to children's safety online (either safeguarding or technical) should be reported to the DSL immediately.

### **10.7 Guidance on filtering and monitoring**

As part of staff regular training there is an expectation that there is an understanding of the schools role in relation to filtering and monitoring – this should take place at induction in the first instance. The training should be regularly updated.

### **10.8 Children who identify as LGBT**

We recognise the fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, we understand that children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

We will:

- provide a safe space for pupils who are LGBT to speak out and share their concerns, and
- train staff so that they understand that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.

### **10.9 Elective home education**

We understand that some parents choose to educate their children at home, are legally able to do so and this in itself is not a safeguarding issue. We encourage parents who are considering removing a pupil from roll for home education to meet with us prior to making a final decision to discuss this with us. This is particularly



important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. As such, we will notify the LA, and social worker where relevant, when a child is removed from roll to be educated at home.

## 11. PUPILS WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND)

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- pupils being more prone to peer group isolation than other pupils
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and/or
- communication barriers and difficulties in overcoming these barriers.

NPAT schools offer extra pastoral support for pupils with SEN and disabilities. Please see individual school SEND reports which are available on school websites.

More information can be found about support for children with SEND here:

- [SEND Code of Practice](#)
- [Directory of Services for Children with Disabilities: Specialist support for SEND<sup>11</sup>](#)
- [North Northamptonshire's Local Offer: SEND Local Offer<sup>12</sup>](#)
- [West Northamptonshire's Local Offer: SEND Local Offer<sup>13</sup>](#)
- [Milton Keynes' Local Offer: SEND Local Offer<sup>14</sup>](#)

<sup>11</sup> <https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/specialist-support-for-send/Pages/default.aspx>

<sup>12</sup> <https://www.northamptonshire.gov.uk/councilservices/children-families-education/SEND/local-offer> ;

<sup>13</sup> <https://www.westnorthants.gov.uk/local-offer>

<sup>14</sup> <https://www.mksendlocaloffer.co.uk/>

## 12. PUPILS WITH A SOCIAL WORKER AND THOSE THAT HAVE PREVIOUSLY NEEDED A SOCIAL WORKER

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health. We work with the local authority to ensure that we are providing effective support for this group of children.

The role of virtual school head now includes a non-statutory responsibility for oversight of the attendance, attainment and progress of children with a social worker.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- responding to unauthorised absence or missing education where there are known safeguarding risks, and
- the provision of pastoral and/or academic support.

We have contact plans for children with a social worker, and other children who we have safeguarding concerns about, for circumstances where they won't be attending school (for example in a local lockdown during the coronavirus pandemic) or they would usually attend but have to self-isolate.

## 13. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements. The DSL has details of children's social workers and relevant virtual school heads.

- We have appointed a designated teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).<sup>15</sup>
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- work with Virtual School Heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their Personal Education Plans, (PEPs).

## 14. RECORD KEEPING

All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing on MyConcern. If in doubt about recording requirements staff should discuss this with the DSL.

When a child has made a disclosure, the member of staff/volunteer should:

- record as soon as possible after the conversation on MyConcern
- not destroy the original notes in case they are needed by a court
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- draw a diagram to indicate the position of any injuries if relevant, and
- record statements and observations rather than interpretations or assumptions.

All written notes need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

---

<sup>15</sup> <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, and
- a note of any action taken, decisions reached and the outcome.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- the first 5 days of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Appendix 4 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks. Appendix 5 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 15. RELATIONSHIPS, SEX AND HEALTH EDUCATION (RSHE)

### **Promoting safeguarding and welfare in the curriculum**

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by each school's:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - healthy and respectful relationships
  - boundaries and consent

- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship (including coercive and controlling behaviour)
- the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- what constitutes sexual harassment and sexual violence and why they are always unacceptable

Please see individual school policies on Behaviour, Anti-Bullying and RSHE which are available on school websites.

## 16. SAFER WORKING PRACTICE

We work to create and embed a culture of openness, trust and transparency, in which the Trust's values and expected behaviour (as set out in the NPAT Code of Conduct) are constantly lived, monitored and reinforced by all staff.

We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff handbook, NPAT Code of Conduct and Safer Recruitment Consortium document [Guidance for safer working practice for those working with children and young people in education settings \(September 2022\)](https://www.saferrecruitmentconsortium.org/guidance-for-safer-working-practice-for-those-working-with-children-and-young-people-in-education-settings).<sup>16</sup>

Governors and senior leaders will ensure that this policy is adhered to by:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others through effective training
- empowering staff to share any low-level safeguarding concerns or 'nagging doubts'
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage, and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

---

<sup>16</sup> <https://www.saferrecruitmentconsortium.org/>

Governors, with the assistance of the NPAT appointed external safeguarding auditor, will help to identify any weakness in the school's safeguarding system.

Staff are expected to adhere to the NPAT Code of Conduct at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (2023).

### **16.1 Staff use of mobile phones and smart technology**

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## **17. SAFEGUARDING CONCERNS ABOUT AND ALLEGATIONS AGAINST MEMBERS OF STAFF**

### **17.1 Allegations that may meet the harms threshold**

In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance. See Appendix 5 for more details.

Allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school or college include:

- staff having behaved in a way that has harmed a child, or may have harmed a child
- staff possibly committing a criminal offence against or related to a child
- staff behaving towards a child or children in a way that indicates they may not be suitable to work with children, and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have **occurred both inside and outside of school.**

## **Allegations against the Headteacher and CEO**

If an allegation is made against the Headteacher, it must be reported to the Chair of Governors. If an allegation is raised against the NPAT CEO, it must be reported to the Trustee responsible for Safeguarding on the Board of Trustees.

## **Allegations against staff**

If a concern or allegation of abuse arises against any member of staff, supply teacher or volunteer other than the Headteacher, it must be reported to the Headteacher without delay. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Allegations of abuse against staff must be reported to the Headteacher as appropriate and not discussed directly with the person involved.

The Headteacher should consider if the concern or allegation meets the threshold for Designated Officer intervention in consultation with the NPAT CEO.

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns or would have been removed if they had not resigned.

## **Support for the staff members subject of the allegation**

(Please refer to the NPAT Allegations against a Member of Staff Policy.)

The subject of the allegation should not be informed until discussion with the LADO has taken place as this may impede the investigation.

The LADO will establish whether the police and/or social care staff involved in any investigation want to impose restrictions on the information that can be provided.

Once the decision has been made to inform the person, the employer should keep the subject of the allegation informed of the progress in the case and arrange to provide appropriate support to the individual while the case is ongoing.

## **Recording**

The Headteacher in consultation with the NPAT CEO will compile a comprehensive summary of the case record which includes detail of allegations made, how they

were followed up and resolved, any action taken and decisions reached will be kept on the person's confidential personnel file, and a copy given to the individual.

Such information will be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age, or for ten years if that is longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference.

It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

### **17.2 Safeguarding concerns that do not meet the harm threshold (low level concerns)**

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2023) and Northamptonshire Safeguarding Children Partnership guidance.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. We will act quickly, proportionately and appropriately in the event of a low-level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children
- having favourites
- taking photographs of children on their mobile phone



- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils.

We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools from potential false allegations or misunderstandings.

Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (2023).

### **Reporting low level concerns**

Low level concerns should be reported to the Headteacher.

All low-level concerns should be recorded on MyConcern. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The Headteacher may:

- speak directly to the person who raised the concern (unless it has been raised anonymously)
- speak to the individual involved and/or witnesses.

The Headteacher will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the school are identified, the school will either:

- take action through our disciplinary procedures
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold, and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

### **17.3 Supply staff**

Although the Trust does not directly employ supply teachers, we will ensure that any concerns or allegations against supply teachers are handled properly. We will never cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome.

NPAT schools will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

NPAT schools will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies.

## **18. COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES**

### **18.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 17). Please refer to the NPAT Procedure for Allegations against Staff.

### **18.2 Other complaints**

Please refer to the NPAT Complaints Policy.

### **18.3 Whistle-blowing**

Please refer to the NPAT Whistle-blowing Policy for the process on raising concerns within the workplace on safeguarding and other issues.

## **19. USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES**

Where the school provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Local Governing Body will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and that there are arrangements to liaise with the school on these matters where appropriate.

## Appendix 1 **Child on child abuse**

### **1. What child on child abuse is**

Child on child abuse is any abuse of a child or children that is perpetrated by another child or children. This includes all forms of sexual harassment, sexual violence and abuse. We strive to create a culture of safety, where children are free from harassment or abuse of any kind. We take a zero-tolerance approach to sexual violence and sexual harassment – it is never acceptable and it will not be tolerated.

We know that even if we do not receive any reports relating to child on child abuse, it does not mean that it is not happening. We support and encourage anyone – especially our pupils – to come forward to share any concerns about child on child abuse so that we can take action to keep all children safe.

### **2. What child on child abuse includes**

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All children are capable of abusing their peers and we recognise that girls are more likely to be the victims of child on child abuse and boys' perpetrators. All child on child abuse is unacceptable and will be taken seriously.

### **Harmful sexual behaviour (HSB)**

We recognise that children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. We refer to problematic, abusive and violent sexual behaviour as 'harmful sexual behaviour'.

When responding to HSB, we will:

- consider the behaviours in a child protection context
- consider the ages and developmental stages of the children involved
- take action in line with local thresholds and pathways guidance and relevant statutory guidance, and
- seek specialist support as required.

We will take action at the earliest possible point, to safeguard children and to prevent problematic, abusive and/or violent behaviour in the future.

We recognise that children displaying HSB have often experienced their own abuse and trauma and we will offer support as required.

### **3. Staff training**

All staff are made aware that children can abuse other children, that this can happen online or in person, at school or outside of school. All staff will receive training so that they can confidently recognise the indicators and signs of child on child abuse in order to identify it and respond appropriately to reports. All staff will be made aware of the school policy and procedures with regards to child on child abuse and the crucial role that they play in preventing it and responding to it as necessary. It will be made clear that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### **4. Procedures for minimising opportunities for child on child abuse**

We recognise that a crucial part of our safeguarding responsibility is to minimise the opportunity for child on child abuse to occur. In order to do this, and to establish a safe environment for all children, we:

- have a robust behaviour policy, which makes it clear that we have a zero-tolerance approach to any kind of child on child abuse

- ensure staff understand what is meant by child on child abuse and the school policy on child on child abuse
- train staff thoroughly so that they challenge inappropriate behaviour (even if it appears to be relatively innocuous)
- train staff thoroughly so that they are confident to challenge inappropriate behaviours between peers, that are actually abusive in nature
- never downplay certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”, as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it, and
- recognise that sexual harassment and sexual violence, as well as other forms of child on child abuse, may be happening even if they are not reported.

## **5. How we address child on child abuse within the curriculum and across the school**

We ensure that our systems for reporting all safeguarding concerns are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously. We ensure that children are aware of our safeguarding and child protection procedures, including how to raise concerns about child on child abuse.

## **6. Additional Vulnerabilities**

We recognise that some children may be more vulnerable to child on child abuse than others. For example, children who have already experienced abuse, those that have special educational needs or disabilities (SEND), children living in care and children who are LGBTQ+, may be more likely to face child on child abuse than other children. We recognise that girls are more likely to be the victims of child on child abuse than boys. Some children may face additional barriers to telling anyone about abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. All NPAT schools work to protect children with additional vulnerabilities. Please see individual school Behaviour and Anti-Bullying Policies for more information on how this handled locally.

## **7. How to report concerns**

### **Our pupils**

If a young person witnesses or experiences any form of child-on-child abuse, we strongly encourage them to speak to a trusted member of staff, parent or trusted adult about it. If a child discloses to an adult outside of school, the adult should contact the Designated Safeguarding Lead without delay to report the issue.

All victims will be taken seriously, regardless of how long it has taken them to come forward and they will be supported and kept safe. Abuse that occurs online or outside of the school will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting child-on-child abuse, including sexual violence or sexual harassment. A victim will never be made to feel ashamed for making a report or have their experience minimised.

Please see individual school Behaviour and Anti-Bullying Policies for more information on ways that pupils can disclose abuse both in school and outside of school.

In the event that a pupil reports or discloses child on child abuse, we will take their report seriously, take prompt action to respond and to safeguard the child or children involved and we will ensure that we are listening to the voice of the child when deciding on the best course of action to take. We will always act in the best interests of children. Following any disclosures or reports of child on child abuse, we will review our school systems, training and policies to determine if any learning can be derived from the situation to further strengthen our approach to this issue. We will always encourage our pupils to safely express their views and give feedback on how they have been supported following a safeguarding concern.

### **Our staff**

Any member of staff that has concerns about child on child abuse should follow the procedure set out in Section 9 and must report concerns immediately.

### **Others**

We encourage everyone to report any form of abuse or harm perpetrated by or against our pupils. Any concerns should be reported to the Designated Safeguarding Lead, using the details on the front page of this policy.

## **8. Wider concerns**

We strive to create a safe and welcoming environment for all children. If you have any concerns about our culture of safeguarding, policy or procedures, please direct

these to the Designated Safeguarding Lead (DSL) immediately or follow the NPAT Complaints Policy.

### **9. What happens when an allegation of child-on-child abuse is made?**

We will adhere to Keeping Children Safe in Education (2023) and the DfE guidance document 'Sexual violence and sexual harassment between children in schools and colleges' (2021) (where applicable) when responding to incidents of child-on-child abuse. The Trust takes child on child abuse seriously and will respond to all concerns or disclosures of child-on-child abuse, including those that have occurred outside of school and online, immediately.

Upon receiving a concern, report or disclosure of abuse, the Designated Safeguarding Lead will decide what further action is necessary.

Our starting point regarding any report of child-on-child sexual harassment or violence should always be that there is a zero-tolerance approach, it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

The subsequent action taken will vary depending on the type of child-on-child abuse and the severity of the incident/s disclosed. The Designated Safeguarding Lead will take contextual factors into account when managing the report.

The Designated Safeguarding Lead will always consider the following:

- the wishes of the victim in terms of how they want to proceed. The victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident(s), including: the level of coercion or threat, whether a crime may have been committed and consideration of harmful sexual behaviour
- both the chronological ages and developmental stages of the children involved
- any power imbalance between the children, including consideration of the age of children and whether children have special educational needs or disabilities
- the impact on the victim
- that sexual violence and sexual harassment can take place in intimate personal relationships between peers
- if the alleged incident is a one-off or a sustained pattern of abuse

- if there are ongoing risks to the victim, other children, adult students or school or college staff, and
- Other related issues and wider context, such as links to child criminal or child sexual exploitation.

Depending on the nature of the incident/s, the Designated Safeguarding Lead may:

- seek further information from those involved and witnesses
- undertake a risk assessment and needs assessment to ascertain steps necessary to safeguard the victim, alleged perpetrator, adults and other children
- decide to manage the concern internally
- organise a meeting with relevant staff and agencies to assess risk and agree a safety plan
- refer the victim and/or the perpetrator to local services for Early Help.
- refer the case to Children's Services via a MASH referral
- liaise with social workers working with children involved (if applicable).
- make a report to the police
- liaise with specialist services.

In the event of a disclosure of child on child sexual violence, we will make an immediate risk and needs assessment. The risk and needs assessment will consider:

- the victim, especially their protection and support. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- whether there may have been other victims
- the alleged perpetrator(s), and
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

More information about these options in relation to sexual violence and sexual harassment can be found in Part 5 of KCSIE (2023).

## **10. Recording procedures**

Members of staff will follow the procedures for recording a disclosure using MyConcern as outlined in Section 9 of this policy. A template to assist with information gathering is available in Appendix 1b along with a flowchart detailing the process in Appendix 1a.



## **11. How we support victims of child on child abuse**

The Trust recognises that child on child abuse has a significant impact on young people and victims are likely to need ongoing support. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. Appropriate support will be put in place for victims of child on child abuse whilst investigation is taking place and following the initial response. Support will continue for as long as it is needed and will be reviewed regularly to ensure the victim is receiving appropriate care. The school will do everything we can to maintain the victim's normal routine. We will do everything we can to protect the victim from further bullying, harassment or abuse as a result of their disclosure.

If a victim of child on child abuse moves to a new setting, the Designated Safeguarding Lead will share the necessary information to ensure that support for the child continues.

### **How we will support alleged perpetrators and perpetrators of child on child abuse**

We have a responsibility to safeguard and support all children. We will adhere to KCSIE (2023) when managing reports of child on child abuse and decide on action and support on a case by case basis.

The school has a responsibility to ensure that an alleged perpetrator continues to receive a suitable education and will consider a range of options in continuing educational provision if they are unable to attend school.

We recognise that children who perpetrate child on child abuse may be being abused themselves. The school will continue to safeguard the alleged perpetrator and provide them with support.

A plan to reduce the risk posed by the alleged perpetrator will be put in place as part of the risk assessment made following the alleged abuse. The Designated Safeguarding Lead will take advice from children's social care, specialist services and the police, as necessary.

The school may choose to impose a sanction or punishment on the alleged perpetrator following an incident of child-on-child abuse. In this case, we will follow the school Behaviour Policy in determining the level and severity of sanction.

If the alleged perpetrator moves to another setting, the Designated Safeguarding Lead will share information as necessary to safeguard the individual and other children at the new setting.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

### **How we will support other children who may have been affected by child on child abuse**

We recognise that victims and perpetrators are not the only children who can be affected by child on child abuse and are mindful of providing appropriate support to those who feel affected.

## **12. Local Safeguarding Arrangements and making referrals**

NPAT adheres to local safeguarding arrangements, as outlined by the Northamptonshire Safeguarding Children Partnership.

For further details of how NPAT schools deal with partner agencies in responding to safeguarding incidents (including incidents of child on child abuse), please see the main body of this policy.

### **Parents**

Parents will be informed of incidents unless sharing information puts a child at greater risk of harm. Children will always be encouraged to speak to parents about child on child abuse unless it puts them at greater risk of harm.

## **13. Whole school response**

We will keep detailed records of any incidents of child-on-child abuse on MyConcern and will look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will take appropriate action. Consideration will be given to whether there are wider cultural issues that enabled the inappropriate behaviour to occur and in order to minimise it happening again, we may:

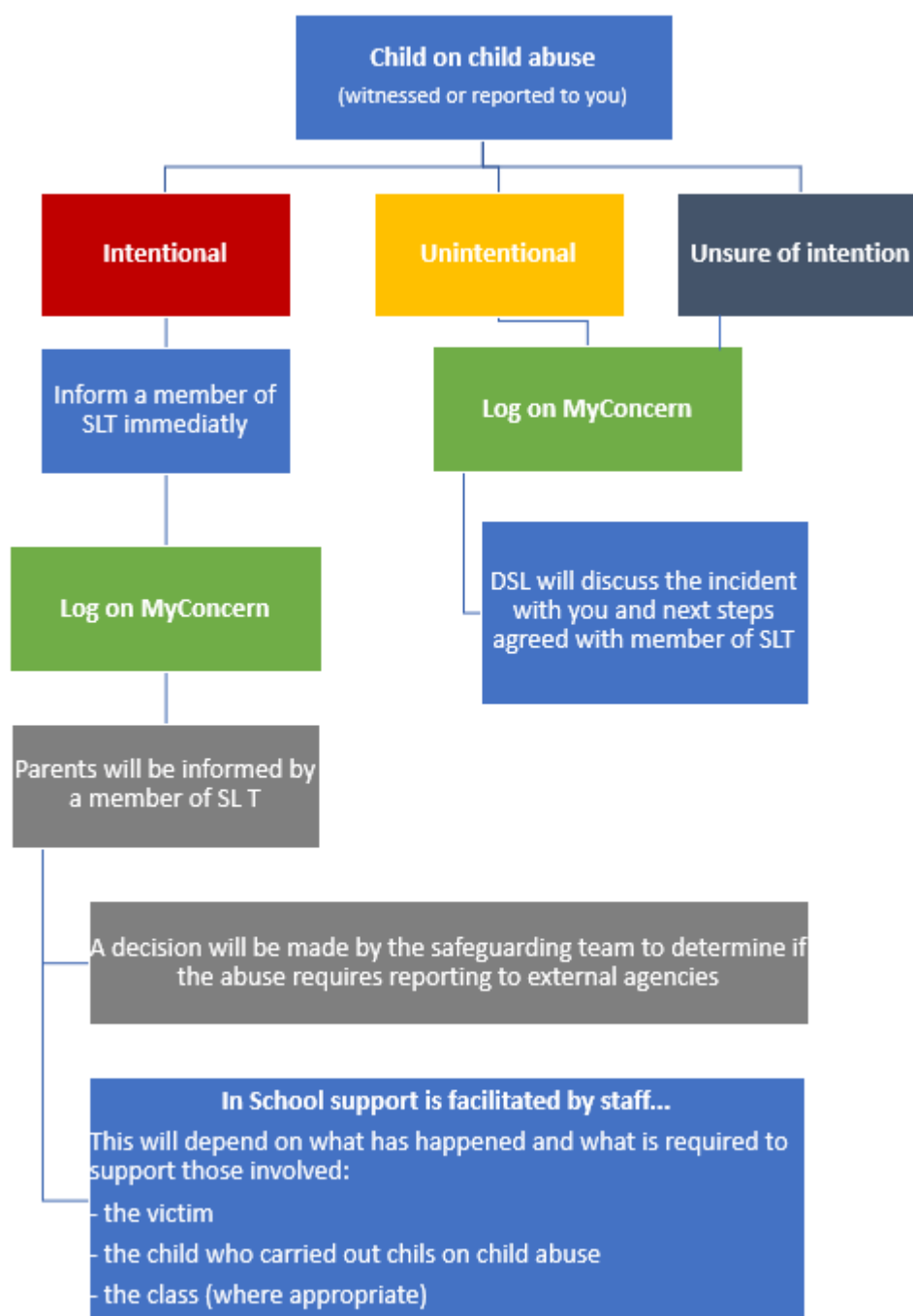
- dedicate more teaching time to a particular issue or topic
- deliver additional staff training.

## Appendix 1a – Child on child abuse reporting flowchart

Please use this flowchart to help in decision making regarding reporting of Child-on-child abuse and in conjunction with the school's Behaviour Policy.

The grey sections are specific to members of SLT and the safeguarding team only.

**If in doubt, you MUST speak to a member of the safeguarding team.**



## Appendix 1b **TEMPLATE – Child on child Incident Abuse Record**

(Please note this form is to help gather notes on the incident which must still be logged on MyConcern.)

<b>People Involved (Victim):</b>			
<b>Is the victim?</b>			
Pupil	<input type="checkbox"/>	Member of Staff	<input type="checkbox"/>
Parent	<input type="checkbox"/>	Governor	<input type="checkbox"/>
Visitor	<input type="checkbox"/>	Other (Please describe in the box below)	<input type="checkbox"/>
Name of victim:			
<b>Victim's Details:</b> (please complete a form for each victim)			
Gender		Year Group	
Religion		Ethnicity	
Pupil Premium		SEN	
Is this the first incident?	Yes <input type="checkbox"/>	No (please provide additional details) <input type="checkbox"/>	

<b>People Involved (Alleged Perpetrator):</b>			
<b>Is the alleged perpetrator?</b>			
Pupil	<input type="checkbox"/>	Member of Staff	<input type="checkbox"/>
Parent	<input type="checkbox"/>	Governor	<input type="checkbox"/>
Visitor	<input type="checkbox"/>	Other (Please describe in the box below)	<input type="checkbox"/>
Name of Alleged Perpetrator:			
<b>Perpetrator's Details:</b> (please complete a form for each victim)			
Gender		Year Group	
Religion		Ethnicity	
Pupil Premium		SEN	

Is this the first incident?	Yes <input type="checkbox"/>	No (please provide additional details) <input type="checkbox"/>

How was the incident brought to your attention?			
<b>Reported to you:</b>			
By the victim	<input type="checkbox"/>	By another pupil	<input type="checkbox"/>
By a parent / carer / family member	<input type="checkbox"/>	Anonymously	<input type="checkbox"/>
By another member of staff	<input type="checkbox"/>	Other (Please describe in the box below)	<input type="checkbox"/>
Name of person reporting the incident:			
<b>Detected by you:</b>			
Witnessed	<input type="checkbox"/>	Signs noticed	<input type="checkbox"/>
Other (Please describe in the box below)	<input type="checkbox"/>	Evidence found by you i.e. written	<input type="checkbox"/>
<b>Details:</b>			

Type of Incident:			
Verbal Abuse			
Sexually explicit comment	<input type="checkbox"/>	Displaying sexual images	<input type="checkbox"/>
Sending emails, messages, letters or texts with sexual content	<input type="checkbox"/>	Asking sexually inappropriate questions	<input type="checkbox"/>
Sexual jokes	<input type="checkbox"/>	Other (Please describe in the box below)	<input type="checkbox"/>
Physical Abuse			
Punching / Kicking	<input type="checkbox"/>	Serious incident of fighting	<input type="checkbox"/>
Throwing objects at victim	<input type="checkbox"/>	Other (Please describe in the box below)	<input type="checkbox"/>



<b>Action / Support for Alleged Perpetrator</b>

<b>Signature of Reporting Members of Staff:</b>	<b>Signature of Headteacher:</b>
Parent / Carers informed by:	Face to face / Telephone call Date:
Parent Comment:	
<b>Parent / Carer Signature:</b>	

## Appendix 2 Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

1. **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
2. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
  - not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
  - age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
  - seeing or hearing the ill-treatment of another
  - serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
3. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve:

- physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).



Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## 5. **Children who are absent from education and children missing from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation (particularly county lines), or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

## 6. **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect
- are at risk of forced marriage or FGM
- come from Gypsy, Roma, or Traveller families
- come from the families of service personnel
- go missing or run away from home or care
- are supervised by the youth justice system
- cease to attend a school
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two, up to date, contacts for parents/carers. Parents/carers should remember to update the school as soon as possible where these contact details change. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Where a child is missing in education, please follow the guidelines here:

<https://www.northamptonshire.gov.uk/councilservices/children-families-education/schools-and-education/information-for-school-staff/pupil-support-and-inclusion/attendance-and-behaviour/Pages/children.aspx>

## **7. Child criminal exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or

pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Indicators of CCE can include a child:

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- suffering from changes in emotional wellbeing
- misusing drugs and alcohol
- going missing for periods of time or regularly coming home late
- regularly missing school or education
- not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the MASH and the police, if appropriate.

## **8. County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.’

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

## **9. Serious violence**

Signs that a child is at risk from, or involved with serious violent crime include:

- include increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- signs of assault or unexplained injuries, and/or
- unexplained gifts or new possessions, which could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school, and/or
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

If a member of staff suspects a child is involved in or at risk of serious violent crime, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **10. Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

Children and young people often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- having an older boyfriend or girlfriend
- suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **11. Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

In the event that anyone has concerns about child abduction or community safety incidents, they should speak to the Designated Safeguarding Lead immediately.

## **12. Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If we have concerns about a child and possible risk of being drawn into cyber-crime, the designated safeguarding lead (or a deputy) will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. We may also include early help and will refer to children's social care if we think a child is suffering or is at risk of suffering harm.

### **13. Domestic abuse**

Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse.

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

At NPAT, we are working in partnership with North Northamptonshire Council and West Northamptonshire Council and Northamptonshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass. In order to achieve this, North Northamptonshire Council and West Northamptonshire Council will share police information with the Designated Safeguarding Lead(s) of all domestic incidents where one of our pupils has been affected. On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt.

All information sharing and resulting actions will be undertaken in accordance with the [‘NSCP Protocol for Domestic Abuse – Notifications to Schools’](#). We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

The DSL will provide support according to the child’s needs and update records about their circumstances.

#### **14. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare.

The DSL [and deputy/deputies] will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children’s social care.

#### **15. So-called ‘honour-based’ abuse (including FGM and forced marriage)**

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## 16. Female Genital Mutilation

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- a pupil confiding in a professional that FGM has taken place
- a mother/family member disclosing that FGM has been carried out
- a family/pupil already being known to social services in relation to other safeguarding issues
- a girl:
  - having difficulty walking, sitting or standing, or looking uncomfortable
  - finding it hard to sit still for long periods of time (where this was not a problem previously)
  - spending longer than normal in the bathroom or toilet due to difficulties urinating
  - having frequent urinary, menstrual or stomach problems
  - avoiding physical exercise or missing PE
  - being repeatedly absent from school, or absent for a prolonged period
  - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - being reluctant to undergo any medical examinations
  - asking for help, but not being explicit about the problem
  - talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- the girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- a parent or family member expressing concern that FGM may be carried out
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- a girl:
  - having a mother, older sibling or cousin who has undergone FGM
  - having limited level of integration within UK society
  - confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"



- talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- being unexpectedly absent from school
- having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

### 17. Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

As of February 2023, it is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages. – (see KCSIE, September 2023. Page 155)

The DSL will:

- speak to the pupil about the concerns in a secure and private place
- activate the local safeguarding procedures and refer the case to the local authority's designated officer
- seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## **18. Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## **19. Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent **awareness training** and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering and monitoring is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour. The government website [Educate Against Hate](https://educateagainsthate.com/signs-of-radicalisation/)<sup>17</sup> and charity [NSPCC](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/)<sup>18</sup> say that signs that a pupil is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves
- becoming susceptible to conspiracy theories and feelings of persecution
- changes in friendship groups and appearance
- rejecting activities they used to enjoy
- converting to a new religion
- isolating themselves from family and friends
- talking as if from a scripted speech
- an unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use
- expressions of sympathy for extremist ideologies and groups, or justification of their actions

---

<sup>17</sup> <https://educateagainsthate.com/signs-of-radicalisation/>

<sup>18</sup> <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

- accessing extremist material online, including on Facebook or Twitter
- possessing extremist literature
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or may be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in Section 9 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including NPAT Preventing Radicalisation and Extremism.

## **20. Non-collection of children**

If a child is not collected at the end of the session/day, school will:

1. contact the parent/career and all other named contacts
2. after one hour of no contact seek advice from the MASH team
3. record actions and advice on My Concern
4. meet with the parent on subsequent occasion if required to outline expectations and adhere to school agreement.

### Appendix 3 **Safer recruitment**

We adhere to Part 3 of Keeping Children Safe in Education at all times. We consider safeguarding throughout the recruitment process, including when defining and advertising roles.

We reserve the right to carry out an online search of shortlisted candidates as part of our due diligence process. This will be completed as part of our safer recruitment process and will be in line with our GDPR responsibilities.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out in the NPAT Safer Recruitment Policy.

## **Appendix 4 How the school responds to allegations that may meet the harms threshold**

Please refer to the NPAT Allegations against staff and volunteers procedure.

## Appendix 5 **Online safety**

Please refer to the NPAT online safety and acceptable use of IT policy

## Appendix 6 NPAT staff mandatory training record 2023-2024

**Staff Member's Name**

### Safeguarding

I am aware of the Designated Safeguarding Lead's in the school. Yes ☐

I have my login details to access MyConcern to report/update safeguarding concerns. Yes ☐

### Safeguarding Training

I confirm I have received Safeguarding Training in the last 12 months. Yes ☐

### Cyber Security

I confirm I have received Cyber Security Training in the last 12 months. Yes ☐

Date of training: .....

### Staff Safer Working Practices

I confirm I have read and will follow the NPAT Safer Working Practices Leaflet. Yes ☐

### Prevent awareness Training

I confirm I have received Prevent awareness Training in the last 12 months. Yes ☐

Date of training: .....

### Fire Training

I confirm I have received training on what to do in the event of a fire. Yes ☐

### GDPR

I am aware of the trust GDPR Policy, who the Data Protection Officer is and have received the Contact card. Yes ☐

I have completed the online training module on GDPR. Yes ☐

### Policies

#### NPAT Child Protection and Safeguarding Policy

I confirm I have read and will abide by the NPAT Safeguarding Policy and Child Protection Policy. Yes ☐

#### Keeping Children Safe in Education

I confirm I have read the Keeping Children Safe in Education Document. Yes ☐



**Working Together to Safeguard Children**

I confirm I have read the Working Together to Safeguarding Children Document.

Yes ☐

**NPAT Online Safety Policy**

I confirm I have read and will follow the NPAT Online Safety Policy.

Yes ☐

**NPAT Acceptable Use Agreement**

I confirm I have read and signed the NPAT Acceptable Use Agreement.

Yes ☐

**NPAT Code of Conduct**

I confirm I have read and will abide by the NPAT Code of Conduct

Yes ☐

**NPAT Whistleblowing Policy**

I confirm I have read and been made aware of the NPAT Whistleblowing Policy.

Yes ☐

**NPAT Communications & Social Media Policy**

I confirm I have read and been made aware of the Communications and Social Media Policy.

Yes ☐

**NPAT Health & Safety Policy**

I confirm I have read and been made aware of the NPAT Health & Safety Policy.

Yes ☐

**School Behaviour Policy**

I confirm I have read and been made aware of the School Behaviour Policy.

Yes ☐

**School Staff Handbook**

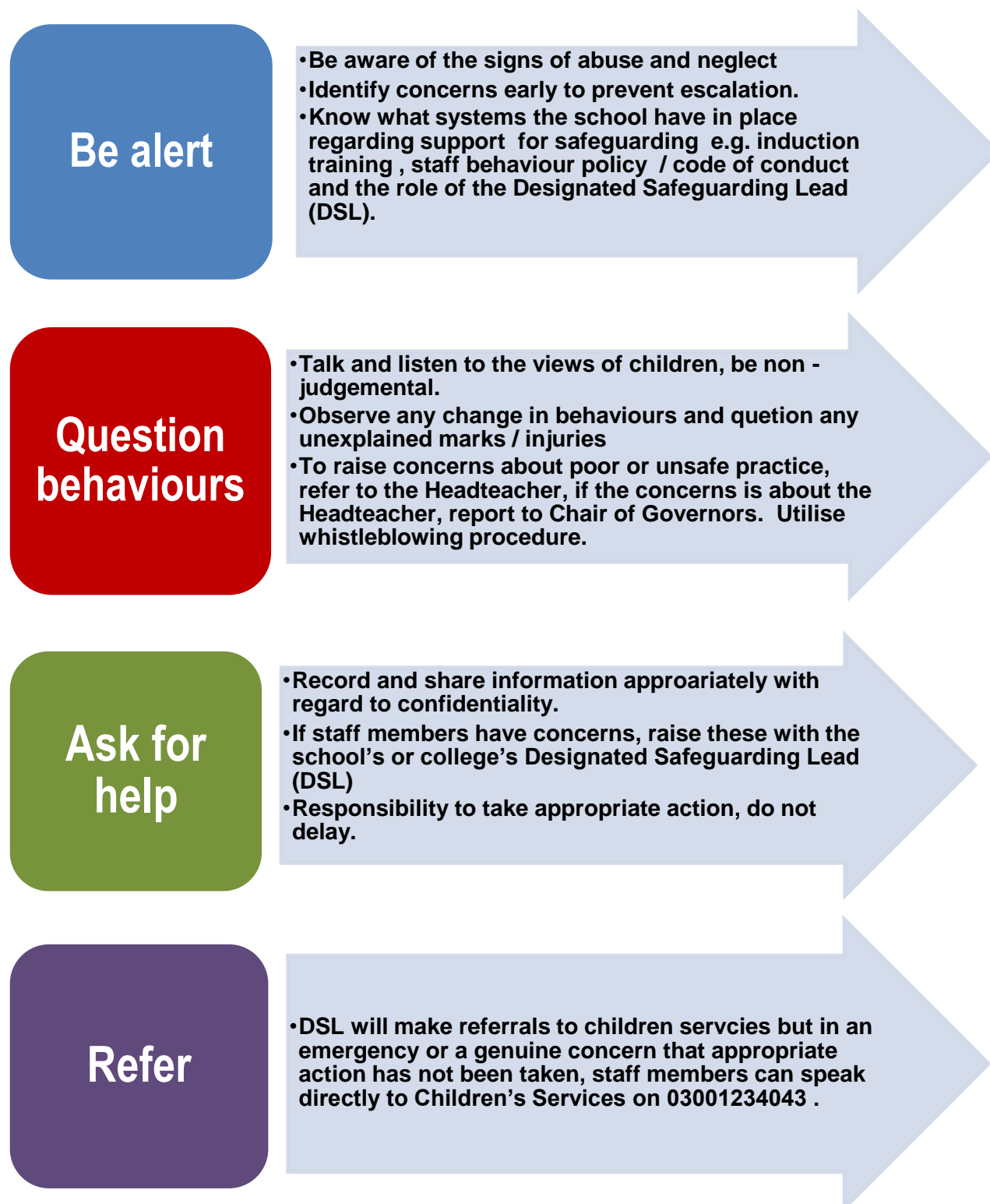
I confirm I have read and will follow the School Staff Handbook.

Yes ☐

<b>Signed</b>	
<b>Date</b>	

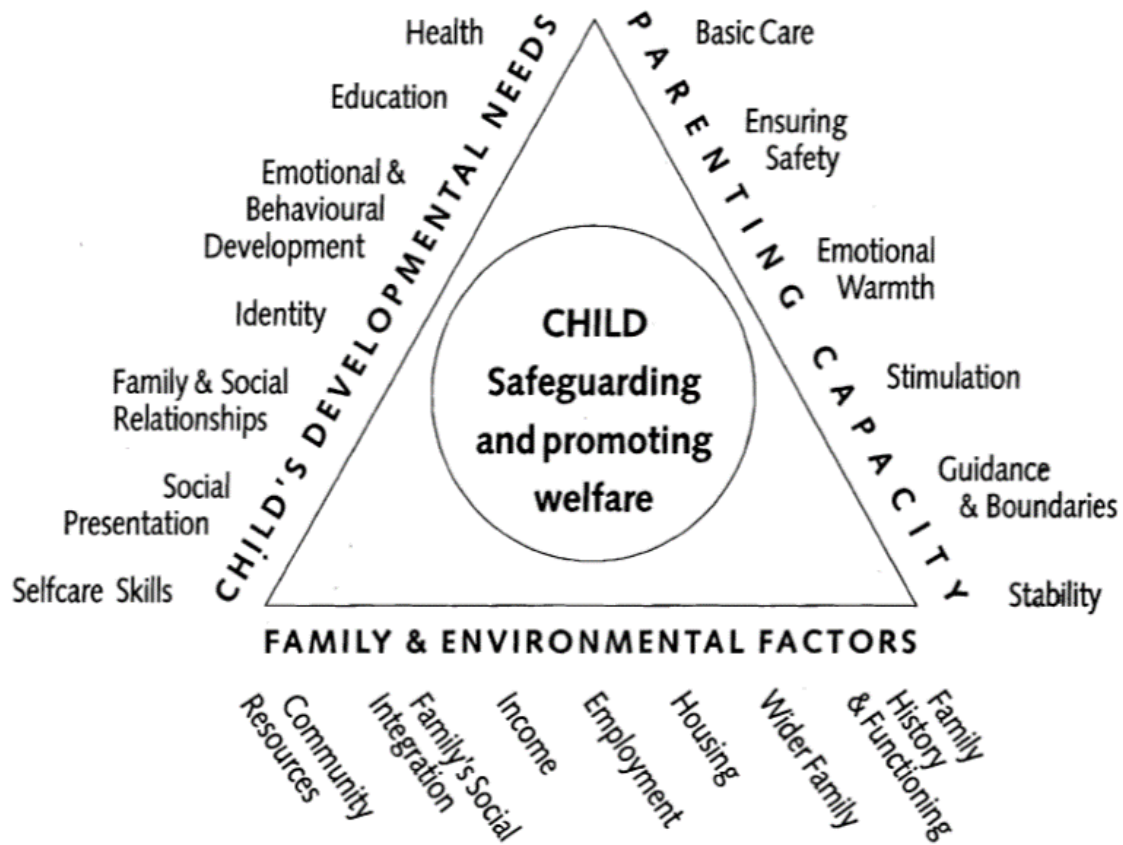
## Appendix 7 What to do if you are worried a child is being abused: Advice for Practitioners (DfE 2018)

### Flowchart



## Appendix 8 Indicators of abuse and neglect

The framework for understanding children's needs:



## Appendix 9 **Child facing guidance to child on child abuse.**

Insert School  
Logo

### **Contents:**

Introduction. Feeling safe and happy at school

1. What is child-on-child abuse?
2. Bullying
3. Sexting
4. Sexual harassment
5. Relationships
6. How do I know if someone is being abused?
7. What should I do if I am being abused?
8. What should I do if someone else is being abused?
9. Who can I talk to?
10. How can I help stop abuse from happening?

## Feeling safe and happy at school

At **xxxx** School, we want to make sure that you feel looked after, safe and happy when you are in and out of school. Sometimes we don't know if something bad is happening, so you need to tell us.

This policy looks at child on child abuse and bullying, and what you can do when you feel you are being abused or bullied, or when you notice someone else being abused or bullied.

We can help you by:

- Teaching you what child on child abuse is.
- Teaching you what to do if you feel like you are being abused, or if someone else is being abused.
- Making sure you know the grown-ups you can speak to if you are worried.



### What is child on child bully and abuse?

A **peer** is someone who might be your friend, a child at school with you, or another child you may know.

**Abuse** is something which usually physically or emotionally hurts another person by using behaviour that is meant to scare, hurt or upset that person.

Sometimes, it can be hard to know when abuse is happening, because not all abuse will hurt, scare or upset you, and you might not know it is happening. It's really important you know when you are being abused so we can make sure it stops.

There are lots of different types of abuse. It is important you know what these types of abuse are, so you know what to do if you see them.



### Bullying

Bullying can be different things and isn't just hitting or kicking another person.

**Emotional bullying** is hurting someone's feelings, leaving them out or bossing them about.

**Physical bullying** is punching, kicking, spitting, hitting or pushing someone.

**Verbal bullying** is teasing someone, calling them names or using rude hand signs. People can also use verbal bullying to be **racist** or **homophobic**.

**Racist** means bullying someone because of their skin colour, race or what they believe in.

**Homophobic** means bullying someone because of their gender or sexuality; calling someone gay or lesbian to hurt their feelings would be homophobic.

**Sexist** means bullying someone because of their sex (whether they are a boy or a girl).

**Cyber bullying** involves sending horrid messages over the internet or by text message. Bullying can be done through another person, by one person sending another person to say nasty things.



### Sexting

This is sending inappropriate pictures, videos or messages – they can sometimes be called ‘nude pics’, ‘rude pics’ or ‘nude selfies’, but can also be rude messages.

Pressuring someone into sending these pictures, videos and messages is abuse.

Even if you are not the person who is sending them, it is illegal to have these kinds of pictures or videos of a person if they are under 18 years old.



### Sexual harassment

Sometimes, people can **act sexually towards others** and it might make them feel uncomfortable.

This can happen **online**, on social media, through messages and **face-to-face**. It might make someone feel **scared**, **embarrassed**, **uncomfortable** or **upset**.

It could be:

- Someone making **sexual comments**, like telling sexual stories, saying **rude things** or saying sexual things about someone's **appearance** or clothes.
- Calling someone **sexual names**.
- **Sexual jokes** or teasing.

- Being physical, like **touching** which makes you feel uncomfortable, messing with your clothes, or **showing pictures** or **drawings** which are of a sexual nature.
- Being sexual online, like **sharing sexual pictures** and **videos**, or posting sexual comments on social media.
- It might also be **sexual threats** or pushing you to do something sexually that you don't want to or aren't ready for.

# 5

## Relationships

Any relationship you have should be **good** and **happy**.

A bad relationship might make someone feel **scared**, **confused**, **worried** and even **unsafe**. It's really important that you know the **DIFFERENCE** between a good relationship and a bad relationship.

### Good relationships



- You are **comfortable** around that person.
- You can be **honest** with that person.
- You can say how you **feel**, what you are **thinking**, and you **listen** to each other.
- You **support** each other and treat each other nicely.
- You feel **safe**.
- You **trust** that person.
- You are **equal** – you don't boss each other around or tell each other what to do.
- You feel **looked after**.

### Bad relationships

- The person might **push** you, **hit** you or **destroy** your things.
- The person might **tell you what to do**, what to wear or who you can see.
- You might feel **scared** – they might say they will hurt you if you don't do something. They might also say they will hurt you if you do something too.
- The person **calls you names**, makes you feel bad in front of other people and **makes you feel bad about yourself**.
- The person gets **angry easily** and you don't know what will make them angry – it might make you feel **nervous**.
- The person might **pressure** you to do things **you don't want** to or aren't ready for, like sex, or using drugs and alcohol.



- The person **might not take no for answer** when you say you don't want to do something.

### How do I know if someone is being abused?

It might be hard for you to know if you are being abused and you **might not really understand** it is happening. It is important you can **recognise** when behaviour isn't appropriate.

It's also important that you can notice when **someone else** might be being abused.



Some signs might be:

- Not going to school.
- Having injuries, like bruises
- Feeling sad and down
- Feeling like they can't cope
- Feeling withdrawn or shy
- Getting headaches or stomach ache
- Feeling nervous
- Not being able to sleep, sleeping too much or getting nightmares
- Feeling panicked
- Using alcohol or drugs
- Changing looks to look much older
- Being abusive to someone else.

**Remember: you can feel all of these things too. Listen to how you feel and know that these signs can mean you are being abused.**



### What do I do if someone else is being abused?

If you see someone else being abused, it is important that you **help** that person.

You should **never walk way** and ignore the problem if you see someone else being abused, because the person might keep upsetting them.

If you can, and it is **safe** to do so, tell the person abusing you to **stop**, but never get angry or hit them.

Tell a **grown-up**, such as a teacher, as soon as you've seen someone being abused. Grown-ups can **stop the abuse** and make that person feel happy again. You should **never feel scared** to tell someone about abuse.



Sometimes, you might not **see someone being abused**, but you might be **worried** about them. Or, you might think they are being abused by **someone you don't know**, or someone they have **told** you about.

It's really important you **tell someone** even if you are worried but haven't **seen** any abuse.



### What do I do if I am being abused?

The first thing you should do is **tell someone** you trust. This could be a family member, a friend or **any adult in our school**.

You can also **tell the person abusing you** to leave you alone. If telling them to leave you alone would **make you feel too scared or worried that they might hurt you**, make sure you tell **someone** so they can help.

You should try not to:

- Do what the person says.
- Let what the person says or does upset you.
- Get angry or hit them.

Always remember that if you are being abused, **it is not your fault** and you are **never alone**. You shouldn't be scared to **talk to someone** if you are being abused. If you talk to a grown-up, we can **make the abuse stop**.



### Who can I talk to?

It is important you **tell someone** as soon as you are being abused, or you notice someone else being abused.

Speaking to someone like your mum, dad, carer or teacher will mean that we can make sure the **abuse stops** and doesn't happen again.



The list below shows some of the grown-ups at our school that you can speak to: e.g. class teacher, a teaching assistant, a midday supervisor



### How can I help stop abuse from happening?

We can all help stop abuse at our school by:

- Making sure we **understand** how we should **act** towards others.

- **Helping** others when they are in need.
- Being **kind, friendly and respectful** to others.
- Thinking about people's **feelings** before we say or do something.
- Taking part in **school activities**, like assemblies, PSHE lessons and circle time, which talk about peer-on-peer abuse.
- **Talking to someone** when we are worried.



**You should know that abuse is never OK, and it is serious. It is not funny, or part of growing up. If you abuse someone, you will get into trouble.**